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February 12, 2025

Via ECF

Hon. Denise L. Cote
U.S. District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Peter Gould v. 54 Below LLC*
Case No: 1:24-cv-09262-DLC

Dear Judge Cote:

Pursuant to Rule 1.E of the Court's Individual Rules of Practice, plaintiff Peter Gould ("Plaintiff") and defendant 54 Below LLC ("Defendant") (collectively, the "Parties"), respectfully submit this joint request seeking an adjournment of the February 21, 2025, Initial Conference, along with the associated filing deadline(s). [Dkt. No. 17].

The original date for the Initial Conference was February 6, 2025 [Dkt. No. 7], which the Court adjourned sine die on January 14, 2025. [Dkt. No. 12]. This is the Parties' first request for an adjournment of the Initial Conference and as such, no previous requests have been granted or denied. This request is made in good faith and not for the purpose of delay and granting this request will not prejudice any party to this matter.

The Parties are currently engaged in settlement discussions and therefore respectfully request that the February 21, 2025, Initial Conference be adjourned forty-five (45) days, so as to permit the Parties time to fully explore the potential for early resolution while reserving the Court's resources as well as the Parties'.

Thank you for your consideration of this request.

Respectfully submitted,

SANDERS LAW GROUP

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Jaymie Sabilia-Heffert, Esq.
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/s/ Armin Ghiam
Armin Ghiam
Attorneys for Defendant

*The conference is adjourned to 3/5 at 11⁰⁰ a.m.
There shall be no further adjournment.*

Denise Cote
2/13/25